

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

JASON KESSLER

and

DAVID MATTHEW PARROTT,

*Plaintiff,*

v.

Civil Action No. **3:19-CV-00044**

CITY OF CHARLOTTESVILLE,  
TARRON J. RICHARDSON, in his  
official capacity, AL S. THOMAS in his  
individual capacity, BECKY CRANNIS-CURL  
in her individual capacity, MAURICE JONES  
in his individual capacity,

*Defendants.*

**CONSENT MOTION FOR AN ENLARGEMENT OF TIME  
TO FILE RESPONSIVE PLEADINGS**

Defendants, the City of Charlottesville, Virginia (“Charlottesville”) and Tarron Richardson, City Manager (“Richardson”), by counsel, request an enlargement of time to file responsive pleadings to Plaintiffs’ Complaint to extend the deadline to the close of business on the same date that Codefendants Maurice Jones, Al Thomas’s responsive pleadings are due under the rules following execution of a written waiver of service by each of them which is anticipated shortly.

1. Plaintiffs filed the Complaint on August 12, 2019 and served on Charlottesville and Richardson on August 22, 2019.
2. Responsive pleadings are currently due September 12, 2019 for Charlottesville and Richardson.

3. The allegations in the Complaint concern a protest that turned violent on August 12, 2017.

4. Defendants Charlottesville and Richardson request extra time to file responsive pleadings. Co-defendant Crannis-Curl joins in the request. On information the Complaint was served on Co-Defendant Becky Crannis-Curl on August 27, 2019. In particular, Charlottesville and Richardson as well as Curl request an extension of time until the date Co-defendants Jones and Thomas' responsive pleadings are due. On information, counsel who will be representing Co-defendants Thomas has contacted Plaintiff's counsel, and an agreement has been reached, and it is anticipated that a written waiver of service will be executed shortly by or on behalf of Maurice Jones and by or on behalf of Al Thomas.

5. Counsel for Defendant Charlottesville and counsel for Co-defendant Al Thomas have conferred with Plaintiffs' counsel who has advised per the attached email that the Plaintiffs do not object and agree to the requested extension.

6. Counsel for Jones have been consulted and agrees with this request and this procedure.

7. For the reasons stated above, the City of Charlottesville, Virginia and Tarron Richardson, by counsel, move this Honorable Court for an Order setting the deadline for Charlottesville and Richardson, and to grant counsel for Curl's request to extend her deadline to file their responsive pleadings to the date on which Codefendants Thomas and Jones' responsive pleadings will be due under the rules following their execution of a written waiver of service, which is October 25, 2019 which would be the due date for Defendants' responsive pleadings.

8. Plaintiffs by counsel consent and have authorized their signature to this Motion.

CITY OF CHARLOTTESVILLE,  
TARRON RICHARDSON, CITY MANAGER  
By Counsel

WE CONSENT:

s/Richard H. Milnor

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*Counsel for City of Charlottesville and*

*Tarron Richardson, City Manager*

s/Elmer Woodard

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*Counsel for Plaintiffs*

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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30<sup>th</sup> day of August, 2019, I electronically filed the foregoing Consent Motion for An Enlargement of Time to File Responsive Pleadings with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/Richard H. Milnor